

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**RECEIVER'S WITNESS LIST**

Thomas W. McNamara, as the Court-appointed receiver (“Receiver”), submits the following list of witnesses that may be called at the evidentiary hearing scheduled for January 23-24, 2025.

1. Javier Avila
2. Jason Blust
3. Cameron Christo
4. Michelle Hinds
5. Katherine Rosenberg

Dated: January 16, 2025

**MCNAMARA SMITH LLP**

By: /s/ Logan D. Smith  
Logan D. Smith (*Pro Hac Vice*)  
Alexander D. Wall (*Pro Hac Vice*)  
McNamara Smith LLP  
655 West Broadway, Suite 900  
San Diego, California 92101  
Telephone: (619) 269-0400  
Facsimile: (619) 269-0401  
Email: [lsmith@mncamarallp.com](mailto:lsmith@mncamarallp.com);  
[awall@mncamarallp.com](mailto:awall@mncamarallp.com)

*Attorneys for Court-appointed Receiver,  
Thomas W. McNamara*